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20 May 1975

MEMORANDUM FOR: Deputy Comptroller

SUBJECT: Inflationary Impact Certifications

1. I have been presented with a letter to send to Mr. Hyde at OMB on our retirement act package which is to constitute a certification that the amendments would have no inflationary impact. In reviewing the controlling 28 January 1975 memo to heads of agencies from Mr. Ash on this subject, and Circular A-107, I have some concerns however:

a. As I read 4e of the Circular, we have an option of requesting an exemption from the Circular (within the 30 days following January 28, 1975) on the basis that we do not propose major legislation, rules or regulations. I assume that someone made a judgment that we could not successfully pursue such an exemption.

b. This means that we do have major legislation, etc., and my concern then is how we evaluate inflationary impact. Apparently such evaluation must be against criteria developed by executive agencies and approved by OMB. It is my understanding that we have not complied with this requirement. Consequently, I don't know how I can honestly certify that there is no inflationary impact against a standard which is non-existent.

c. Finally, under paragraph 5b of the Circular, it appears that the data and analysis underlying our evaluation must be made available upon request from OMB.

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2. I understand that Ralph Malvik of OMB, Legislative Reference Service, has stated that our proposal does not have an inflationary impact. However, I am in a quandry as to how this judgment can be reached if, as I have been informed, no CIA standards for the evaluation exist, making impossible the required determination which must precede the certification.

3. I would appreciate any suggestions or explanations you can provide.



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